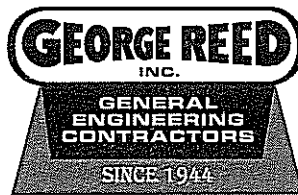


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State Contractor's License No. 211337-A



February 13, 2009

Mr. Timothy O'Brien
California Regional Water Quality Control Board
11020 Sun Center Drive #200
Rancho Cordova, CA 95670-6114

VIA FACSIMILE (916) 464-4645
VIA E-MAIL

**RE: TENTATIVE WASTE DISCHARGE REQUIREMENTS FOR GEORGE REED, INC.
MUNN & PERKINS AGGREGATE PROCESSING FACILITY, SAN JOAQUIN COUNTY**

Dear Mr. O'Brien,

Thank you for providing the opportunity to comment on the above referenced tentative WDR. We have reviewed the order and offer the following comments for consideration and/or clarification.

WASTE DISCHARGE REQUIREMENTS

AGGREGATE PROCESSING OPERATIONS

Page 1 / Item #5

This facility does not process ore material. "Building stone and industrial materials, such as abrasives, clays, refractories, lightweight aggregates, and salts, are not considered ore; they are classified as industrial rocks and minerals, or *economic minerals*, a term that includes both industrial materials and *ore minerals*."¹ The materials processed at the Munn & Perkins facility are construction grade products consisting of sand and gravel. It would be suitable to state: "Presently, most of the industrial rock and sand material processed originates off site."

Page 2 / Items 10 & 11

These items contain references to the "11-acre site planned for excavation". The 11 acres referred to are located within the facility property boundaries. Although this planned excavation activity was the nexus for initiating a WDR update, the project itself will not be coming to fruition. Therefore, the 11 acre site will be replanted with a new orchard and is no longer a potential mine site. References to the project should be removed from the WDR. The final sentence of item #10 and entire contents of item #11 should be deleted.

¹ "Ore Deposits" (Third Edition), Park and MacDiarmid, ISBN 0-7167-0272-X

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Page 2 / Item 14

The final sentence currently reads: "The material is crushed and screened into a finished product for California Department of Transportation grading specifications." The sentence might be more comprehensible if it stated: "The material is crushed and screened into a finished product conforming to California Department of Transportation grading specifications."

MONITORING AND REPORTING PROGRAM

A. Monthly Monitoring Reports

The "Effluent Monitoring" summary preceding this section stipulates a reporting frequency on a quarterly basis. Could this section please be revised to reflect the quarterly reporting frequency in lieu of a monthly occurrence?

ATTACHMENTS

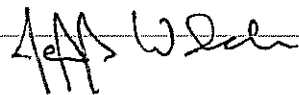
Attachment B / Site Plan

The reference to the "Future Ex. Area" in the upper left hand portion of the Site Plan should be eliminated to correlate with the prior requested WDR Page 2 deletions (Items #10 & 11).

This concludes our comments. If you should have any questions concerning this matter, please contact me at either (209) 521-9771 or via e-mail at: jeff.welch@reed.net

Sincerely,

George Reed, Inc.



Jeff Welch
Agency Compliance

/jw

cc: San Joaquin County Planning Department, Stockton
Mike Huggins, San Joaquin County Environmental Health Department, Stockton
File